

REC'D OCT 05

### **Important Privacy Notice**

Federal Rule of Civil Procedure 5.2 prohibits litigants in a non-habeas proceeding from submitting documents that contain personal information. Unless the Court orders otherwise, personal identifying information in Court filings must be limited as follows:

- Social security numbers, taxpayer-identification numbers, and financial **account numbers must include only the last four digits** (e.g., xxx-xx-1234)
- Birth dates must **include the year of birth only** (e.g., xx/xx/2000)
- Names of persons under the age of 18 must be indicated by **initials only** (e.g., A.B.)

You are responsible for protecting the privacy of this information in your filings. If your documents, including attachments, contain any information that does not comply with this rule, please black out that information before sending your documents to the Court.

**EXHIBIT A**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA

REC'D OCT 05

Margo A. Weems  
& her child TMW

(In the space above enter the full name(s) of the plaintiff(s).)

- against -

Childrens Hospital of Philadelphia  
City of Philadelphia; Office of  
City Solicitors, Dept. of Human  
Services - to include but not limited  
to Community Umbrella Agencies(3)  
BHS, CARO, CYD, CRS, City of  
Phila BHS Doctor Foote, Nurse  
Gina Weal RN., Noa Glitch Psy.D  
Jennifer Cole, Forensic Mental  
Health Services, LLC / ATA, Interact  
Phila. County Family Court Judges; see attached

**COMPLAINT**

Jury Trial: ☐ Yes ☐ No

(check one)

(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)

**I. Parties in this complaint:**

- A. List your name, address and telephone number. If you are presently in custody, include your identification number and the name and address of your current place of confinement. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff	Name	<u>Margo A. Weems</u>
	Street Address	<u>5131 Greene St</u>
	County, City	<u>Philadelphia PA 19144</u>
	State & Zip Code	
	Telephone Number	<u>(215) 381-7940</u>

- B. List all defendants. You should state the full name of the defendants, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant can be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary. *See attached.*

Defendant No. 1

Name Children's Hosp. of Phila  
 Street Address 34<sup>th</sup> St & Civic Center Blvd  
 County, City Philadelphia, PA ~~PA~~  
 State & Zip Code PA 19104

Defendant No. 2

Name Children's Hospital of Phila  
 Street Address 7700 Germantown Ave  
 County, City Philadelphia, Phila  
 State & Zip Code PA 19118

Defendant No. 3

Name City of Philadelphia office of City Solicitors  
 Street Address 1515 Arch St  
 County, City Philadelphia, Phila.  
 State & Zip Code PA 19102

Defendant No. 4

Name City of Philadelphia Dept of Human Services  
 Street Address 1515 Arch Street  
 County, City Philadelphia, Phila.  
 State & Zip Code PA 19102

*See attached.*

## II. Basis for Jurisdiction:

Federal courts are courts of limited jurisdiction. Only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount in damages is more than \$75,000 is a diversity of citizenship case.

- A. What is the basis for federal court jurisdiction? (check all that apply)

☒ Federal Questions

☐ Diversity of Citizenship

- B. If the basis for jurisdiction is Federal Question, what federal Constitutional, statutory or treaty right is at issue?

The Federal Constitutional Amendments: 2<sup>nd</sup>, 4<sup>th</sup>, 5<sup>th</sup> and 14<sup>th</sup> and the Indian Child Welfare Act of 1978.



C. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party?

Plaintiff(s) state(s) of citizenship United states of America

Defendant(s) state(s) of citizenship unknown

III. Statement of Claim: See attached.

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

A. Where did the events giving rise to your claim(s) occur? CHOP, DHS, Intercommunity Action, Inc, Mental Health Services LLC, Phila County Family Court, & Phila CUA locations & 5131 Greene St. Mylhome.

B. What date and approximate time did the events giving rise to your claim(s) occur? These events discussed & more occurred between 2014 & 10/2022.

c. Facts: My daughter was taken, kidnapped without cause base on lies told by CHOP, DHS a family member & Family court Judges. My character was assassinated and my professional calling has been destroyed. My child has experience abuse & neglect. My family / relationship w/ my child has been damage. Motherhood stolen & reputation ruined, (see attached)

The agencies & people listed in this lawsuit (yet not limited to:) colluded & conspired efforts made these events possible.

Yes, possibly, There were Supervisors, facilitators, Dept. heads & Overseers, Commissioners whom should have been informed.

Family members & friends, Neighbors, Childcare providers, Mental Health specialist Co-workers & City of Phila. employees & lawyers.

IV. Injuries: See attached.

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received.

Undue stress, Mental Anguish, emotional distress which led to anxiety sleeping issues, eating <sup>problems</sup> and menstrual cycle disruption; blood clot in my lung, Pain throughout my body & a lack of desire to build relationship (trusting). Breakdown of faith/spirituality & confidence. My daughter developed Separation Anxiety, PTSD, focus & possible learning issues, sadness, grief - etc. attachment issue, Frozen finger, twisted leg, Financial Debt & missed promotions. eyes Jaundice SAD systems. etc.

V. Relief:

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking, and the basis for such compensation.

I want my daughter returned to me; full custody care & control without the threat of DHS involvement. My child will need to be able to attend a top rated school & be provided transportation to & from school. And a medical advocate to be at the hospital & all doctor appointments with my child. An apology to both me & my child in person and writing. Monetary Compensation \$154,000,000.00 or the highest amount the court will award. I also would like the DHS, Family Court system regulations changed & more protection for families and children involved in the system or funding from Federal govt. limited, and other negative outcome re-opened & investigated, And charge placed on workers, Judges & lawyers found guilty of ruining child & families.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 4<sup>th</sup> day of October, 20 22.

Signature of Plaintiff

Mailing Address

Telephone Number

Fax Number (if you have one)

E-mail Address

Margo A. Weems  
5131 Levene St.  
Phila., Pa 19144

(215) 381-7940

Weemsmargo42@gmail.com

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint. Prisoners must also provide their inmate numbers, present place of confinement, and address.

For Prisoners: N/A

I declare under penalty of perjury that on this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, I am delivering this complaint to prison authorities to be mailed to the Clerk's Office of the United States District Court for the Eastern District of Pennsylvania.

Signature of Plaintiff: \_\_\_\_\_

Inmate Number \_\_\_\_\_



**Note:**

**This Designation Form must be signed before submission to the Clerk's Office *or a case number will not be assigned.***

DESIGNATION FORM

(to be used by counsel or pro se plaintiff to indicate the category of the case for the purpose of assignment to the appropriate calendar)

Address of Plaintiff: CHOP, DHS, Family Ct. Interact ATA  
Address of Defendant: City of Philadelphia, PA  
Place of Accident, Incident or Transaction: City of Philadelphia, PA

RELATED CASE, IF ANY: Superior Court PA T.O.P. 65.37, CP-51-AP 000093-2019

Case Number: CP 51 DP000189-2017 Judge: Family Ct./Superior Ct. Date Terminated: 4/14/2020

Appeal Docket # 2791/2292 EDA 2019

Civil cases are deemed related when Yes is answered to any of the following questions:

- |  |                              |  |
|--|------------------------------|--|
| 1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court? <u>?</u>                               | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court?            | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action of this court? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual?  | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |

I certify that, to my knowledge, the within case ☐ is / ☐ is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: 4/10/2022 M.A. Weems Must sign here  
Attorney-at-Law / Pro Se Plaintiff Attorney I.D. # (if applicable)

CIVIL: (Place a ✓ in one category only)

A. Federal Question Cases:

- ☐ 1. Indemnity Contract, Marine Contract, and All Other Contracts
- ☐ 2. FELA
- ☐ 3. Jones Act-Personal Injury
- ☐ 4. Antitrust
- ☒ 5. Patent
- ☒ 6. Labor-Management Relations
- ☒ 7. Civil Rights
- ☒ 8. Habeas Corpus
- ☐ 9. Securities Act(s) Cases
- ☐ 10. Social Security Review Cases
- ☒ 11. All other Federal Question Cases

(Please specify): \_\_\_\_\_

B. Diversity Jurisdiction Cases:

- ☒ 1. Insurance Contract and Other Contracts
- ☐ 2. Airplane Personal Injury
- ☒ 3. Assault, Defamation
- ☐ 4. Marine Personal Injury
- ☒ 5. Motor Vehicle Personal Injury
- ☒ 6. Other Personal Injury (Please specify): \_\_\_\_\_
- ☐ 7. Products Liability
- ☒ 8. Products Liability - Asbestos
- ☒ 9. All other Diversity Cases

(Please specify): \_\_\_\_\_

ARBITRATION CERTIFICATION

(The effect of this certification is to remove the case from eligibility for arbitration.)

I, M.A. Weems, counsel of record or pro se plaintiff, do hereby certify:

☒ Pursuant to Local Civil Rule 53.2, § 3(c) (2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs:

☒ Relief other than monetary damages is sought.

DATE: 4 Oct 2022 M.A. Weems Sign here if applicable  
Attorney-at-Law / Pro Se Plaintiff Attorney I.D. # (if applicable)

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.



Chop-9/2016 Denied my child services she needed when I brought her to hospital with fever. They rush me out of hospital with medication for my child. They did not do blood work to check for bacterial infection or her blood levels for her SCD.

9/2016 I returned with my child because her fever did not cease. They evaluated her & admitted her which is should have been done the day or two before when I brought her to the hospital, medical neglect/malignant Neglect. The emergency room nurse was forcing the medical dispenser (shaped like a spoon) down my child throat. I told her to stop and give it to my child she can take it herself. The ER nurse called DHS and told them that I allow my child to administer her own medication, which is a lie. Chop later decided to say that I caused bacterial infection in my child which is again a lie. This was an effort to cover discrimination /lack of service.

This was done to cover up CHOP Malignant Neglect/medical neglect.

CHOP also stated that I was crazy & <sup>asac</sup> ~~asac~~ War Veteran. SW Trudy Johnson said that I told her that. I did not tell her I was a War Veteran because I am not a War Veteran, nor do I have Mental Health issues. SW Trudy Johnson is friends with my child's father other baby mom. She may have told her this or perhaps my sister made the statement, I did not. I would not dishonor fellow soldiers by claiming an Honor, I was blessed not to have.

CHOP stated that I brought my child to the hospital seven times for bug bites. They did not indicate over what time period this occurred. Not to mention I did not bring my child to Chop seven time for bug bites. The number of visits & for what my child was brought to the hospital for can be found in the record. And if I had brought my child to the hospital for any issue CHOP should have done their job and addressed my child's medical needs.

CHOP SW Jodi Houlon LSW denied my request for dermatologist service for my child, breaking the Keystone First patient/provider Agreement. She later falsified documents as if she made a Referral for services & my child was seen when this never occurred. She is also the SW whom called me in comparison to me calling her. She spread rumors through the hospital about my "Mental Health" status, breaking HIPPA laws & discriminating against me & my child for services needed. She provided me with information on how to treat for bedbugs, she & CHOP later said did not exist. Statement made that my child & I had bugs no-one else could see, which I did not say. This CHOP SW lied all through my child's medical record, falsifying facts, statements, etc. My child was evaluated by St. Christophers Hospital whom did see nats/lice. And I was evaluated by Work Comp and they documented bug bites.

And a Dermatologist whom said that my child had scars from insect bites on her inner leg thigh near her vaginal area. CHOP medical staff chose not to look & ignored my child's medical needs, medical neglect.

Doctor Harthung went on to say that he did not believe I that I was capable of proving my child with her medication, when I was the one who was giving my child her medication the entire time. Doctor Harthung later went on to over medicate my child. Over prescribing Hydroxyurea causing my child headaches in an effort to make it look as if my presence in my child life caused her to become sicker.

mtg (Olena)  
TMW

He & Doctor Denise Fitzpatrick spread broke HIPPA law spreading rumor about me & my child through out CHOP. Doctor Michelle Lambert made a comment about me saying my child handles her own diarrhea. Uncertain as to why I would make such a statement. However most individual use the bathroom on their own just as my child at 4yrs old would do. She attempted to misconstrue my statement & make me appear out of touch with reality. These are just a few of the statements made by CHOP employees used to defame my name & assassinate my character. CHOP called DHS to file reports against me in order to have my child removed from my care & custody. DHS SW Brian Bell informed SW Jodi Watsons that this was not enough to open an investigation. CHOP SW Jodi Watson responded that they were going to make it enough. CHOP & DHS then colluded on how best to take my child from me. These statement can be found in my child's medical record and were sent via emails.

Carson Valley was suppose to be the CUA which was going to provide exterminator services for my home. I was told to get three estimates. The first estimate cost was listed as \$3000.00+. The CUA CW Denise Atom said that the price was too high & DHS would not pay for it. So then at that point I no longer needed her services because she/they were not going to provide the service I needed. I spoke with the exterminator. He told me the next lower price service would be using pesticides i.e. Derma Earth and putting it around the home. That already had been done in my home. CUA CW D. Atom requested that I get a Mental Health evaluation but since my time was limited as a single mom I chose not to. I was never informed that the exterminator service being provided would be depending on whether or not I was evaluated for Mental Health. I was never informed of my Rights or responsibilities.

Nor was I informed that my child would be taken if I did not do exactly what I was order to do. They misinformed, misguided & manipulated me & my child, abusing their power & misusing their authority.

I never had a Mental Health issue before & I did not have a Mental Health issue then. I was never informed that any of these actions requested were mandatory. In fact the paperwork states that all of it was voluntary & I could discontinue services at anytime. I later was informed that CUA CW D. Atom was getting her hair done for free by my sister, The Childcare provider whom intentionally brought Bedbugs & fleas in my home to cause an issue for me. The Childcare provider is also the person whom attempted to take my child out of my home without my permission even before DHS became involved. This can be verified through Police reports.

Before my interaction with CUA CW Denise Atom occurred DHS SW & DHS/City of Phila. Nurse Ms Gina Weal, RN came to my home. Nurse Ms. Weal wrote in her report that I believed there were bugs in all orifices of me & my child body. I did not share any of my beliefs with this nurse or anyone else. Most of these statements are the writers of the reports interpretation, not my comments. She checked my home for my child medication, which was fine. They did not inspect my home for bugs. SW Brian Bell did later do a walk through of my home, he is not a license exterminator therefore I am uncertain he is qualified to say if there were any insects in my home. Not to mention he did not put much effort into the home inspection. But he did diagnose as Delusional. He did not evaluate me and again he was/is not qualified as a Mental Health doctor license to diagnose me. They stated that all I did was talk about bugs during the interview. I answered their questions, with that said all they did was ask me about bugs.

With this illegal diagnose DHS SW Brain Bell was somehow able to get a Subpoena for court. They reinforced lies, slandering my name & defaming my character. They also submitted paperwork to the court that contained unverified statements as fact, which is libel. DHS SW Brian Bell threaten me at the first FSP meeting I attended. He told me that I was going to regret this & he was going to make sure I did.



*May de la Cruz*  
*TMW*

The Subpoena was stuck to my door late Sat night. I received it at approximately 11:30 pm when I returned to my home. This did not provide me an opportunity to have a lawyer review nor advise me. I showed up at court with my child as ordered to by the Subpoena. No pretrial hearing was offered or held. The Public defender assigned to my case provide inadequate legal service/advise.

The Public defender did not advise me of what to expect in the court room nor did she inform me of my rights. CHOP sent a SW Rep whom repeated lies told by CHOP SW/ medical staff in an effort to attack my character. Then Judge asked me a question about bugs in a sarcastic, belittling tone. And I answer his question , he became embarrassed & enraged. He took my answer personally and then he began his raft of power on me & my child's lives. He order me to be evaluated by the City of Phila. Psychologist. The City of Phila. Psy D Foote diagnoses me with Anxiety. He spoke to the DHS case worker Brain Bell & then to Judge Vincent Furlong. He stated that Judge Furlong told him to change the report. "I did what the judge told me to do. He change the diagnosis as directed by the Judge, based on lies told by DHS SW B. Bell diagnose as Delusional, Yet in his report he wrote" No delusion or Hallucinations"

At every court date Judge Furlong made it a practice to insult & disrespect me. The CUA SW Aleshia Lomax came to every court date with misconstrued description of events that she did not converse with me about at all, in an effort to mislead and deceive the court & keep my child in DHS custody. When I reached out to her about the condition my child was living or dealing with she totally ignored my statements.. She did not even check on my child. Nor did she keep the family informed of events school , etc. going on in my child's life. This left my child in despair. My child had a play at school & CUA SW Lomax did not inform the Childcare provider of the event. My child went on stage looking for family , her support. And no one was there for her. I was told my child yelled and screamed at the top of her voice. There began the breakdown of my child, causing me mental anguish. My child had a Pain Crisis which no one at the school was informed of how to handle where my child again began to cry & scream in the classroom. This from a child whom never raised her voice, nor wrote on the wall or demonstrated barely any kind of misbehavior. They destroyed my child's happiness. This is just one example of DHS employ. Subcontractors' dereliction duties. My daughter told me that MS Lomax touched her, I reported Ms Lomax to PA DHS. And the Child therapist Lena Hayes was not informed of this kind of damaging/neglectful events that occurred to my child while in DHS custody. My child almost drowned at an Amusement Park & was involved in two car accidents. She experience homelessness & was not receiving proper nutrition for a while under DHS care. I was not given a chance to speak up on my own behalf nor my child behalf in court. I view this as violation of my freedom of speech which has helped lead to mental anguish and my child PTSD. They used Corporal Punishment on my child, I was informed by another child, family member.

On the second court date City of Phila. City Solicitor Caroline Curley asked me if I was the former employ of DHS Youth Study Center. I said yes. It was then that the City of Phila began its Retaliation Practices. They disregard most of my Demographic information & omitted every good thing I've ever did in my careers, work with children or education. They misconstrued the facts. For example I studied Bio-chemistry in college, they used this to define me as a mad scientist to the judge. Stating I gave my child a Bleach bath, which is a lied. I never did that. The judge acting out of his judicial role later stated that I put acid in my child's hair. I corrected him by informing him that the police were called & I have a police report which states that they know I did not do these things because my child would have been in

Mingo Worms  
TMW



the hospital. The judge furlong continued to accuse me of these behaviors. The court once informed me that they did not know if I was a Veteran, this was stated after the court took for fact CHOP statement of me being a War Veteran with Mental Health issues. They also denied me my Native American Heritage therefore violating my rights in the ICWA Indian Child Welfare Act of 1978. They rejected any report that did not fit their narrative describing me as an unfit parent. In March 2017 Judge Furlong himself stated that there was no basis for these court actions, yet he continued the court proceedings. When my lawyer Nino Tineri showed up in court the judge change the goal to Terminating of Parental Rights. I was told after court by a court employee that the Judge does not like high profile lawyers and that Judge Furlong is the take the kids judge. Before the occurrence of the TPR. Judge Furlong once tried to throw out my case because May menstrual cycle came on & I went to the rest room to address my female needs. The court attempted to dehumanize me for having a menstrual cycle. My lawyer wrote a motion & had my case reinstated. The Judge also ordered that I be evaluated by Forensic doctor William Russell. I did go for the evaluation not because I wanted to but because I was informed that if I did not attend my child would be taken: I considered that threat. As well as I must sign all documents whether or not the information was correct or I was in agreement with it. This is a very unfair practice that appears to be illegal & intimidating. There were quite a few illegal actions that were implemented & continue to be imposed upon me during this process with family court & DHS, City of Philadelphia. Forensic Doctor William Russell falsified the testing results and wrote a damning report for the court. The CUA CW Ceria Bradsher came to court & perjured herself each time she appeared in court as well as the Phila. City Solicitors. Ms. Bradsher also told me that she & the childcare provider were pulling & dragging on my child, that's abuse for a child whom has SCD. There has been so much illegal corruption implemented upon me & my child that I am unable narrate it all. The Child Advocated did not even speak to my child for about three years & he slept in court. The stress & mental anguish I experience each time I relive the experience when I attempt to describe the unchecked abuse & mis-use of power & authority. They forced me to receive Mental Health treatment that I did not need. And they currently are trying to make me repeat the treatment again, this is harassment. I had Anxiety about being judge by an authority figure for reasons that were unjustified.

In 04/2019 the court terminated my Parental Rights for not performing my Parental duties which I was limited to perform because of the unjust court regulations imposed by the family court judge, the City of Phila. City Solicitors Office, DHS & the CUA agencies & workers. I appealed to Superior Court of PA & won. Instead of correcting the situation and returning my child these people went further to alienate my child from me. Judge Furlong place an annotation on the court order saying the Visits are up to the child's discretion. As if a 9 yrs old child can decide to attend a visit & bring herself to the visit half way across town. Or even express whga6t is truly in her heart or knows what is in her own best interest. Imparticularly after being cohered, brain washed & lied to. This represents Child abuse at an extreme level which has contributed my child 's Separation Anxiety & Stockholm syndrome. I was denied any type of visit with my child for about a year after the Appeal. This was a discriminating practice since DHS policy is that the visit are twice a week for an hour a piece in person. There was no reason for the change & the visits were never re-instated. Then I was granted a virtual visit which ended when my child "Signed "to me that she loves me very much & that was reported to this court. This court , DHS, City of Phila Solicitors office have been attempting to justify their wrongful actions of taking my child without cause, and holding her captive for the past five years. They have used my daughter's image as part of their advertising of the CUA agency after I directly told them not to. They also gave my child or allowed my child to receive the COVID 19 vaccine without my permission when it was against the PA law

*Mauro Weiss*  
TMW

to do so. My child has SCD & I did not give them permission to Vaccinate my child. When I requested my child records, all of her records from DHS/CUA they never provided them for me. This I was entitled to & the court ordered them to provide them for me. In fact as a whole the court has done everything that they could to mislead me throughout this processed. They have used Gas lighting techniques on me in an attempt to have me help them build a case against me which has caused me great stress and affected my health and my employment mobility/finances. The other City Solicitor Mc Caughlin stated that I caused my child's medication to increase. When the Pharmaceutical reports confirm my child's medication increased when My child was taken by the court/DHS.

The CUA CW Brasher recently lie in court & said I was threatening her & coming to her. When actually I was talking to my sister & she and my daughter came over to me. The incident was record on the camera outside of the court room. I did not threaten her, she lied. I was talking to my child about right & wrong / lying. I also asked my child if anyone was touching her. And my daughter became upset. They are attempting to try to hold this against me, infringing upon my freedom of speech. Then The PsyD. Jennifer Cole said that she knows for fact that I came to a visit without permission, I didn't tell her that. She is saying that after the Judge accused me of that, when in fact I had permission for my conversation. And I am to go to doctor visits if I want my child returned to me & I was sent an invitation to attend the doctor visit. In the past I attended my child's doctor visits & there was no CUA/DHS Social Worker present. Once during a visit a CW went through my bag without my permission, illegal search.

This Doctor has put quotes/comments in her PCE report that I did not make. And when I attempted to reach out to her, the office says she is unavailable; out on FMLA/maternity leave. I did know she was/is with child. Her PCE is bias, tainted & inaccurate. And for me to be directed to receive treatment I've already received is harassment. The PCE recommendations need to be reviewed, discussed and revised.

A recommendation of Family counseling to include my sister was also made by Psy D Jennifer Cole. My concern is that my sister does not want to do Family Counseling & secondly, my child is being forced in to interacting with my sister the same person whom created this situation for me & my child with all of her lies & unwarranted opinion. I find this to be abusive to both me and my child. My Sister was deemed unfit by Delta at the start of all these actions. The Interact current Child Therapist also currently present as unavailable. She stated to me that my daughters PTSD is due to my child interaction with DHS. When my child was evaluated BHS Noa Glitch PsyD at the start of this experience my child was noted as happy & intelligent. My daughter also told informed Ms. Glitch that I always treated her nice as well as other comment made by my child that suggest she was properly cared for & loved. After being in DHS care I'm told my child has mental health issues & learning disabilities. This is unacceptable & very disheartening.

There are court documents throughout this process that confirm my full compliance with the court/goals. Direct quotes from the DHS/ CUA workers that I am not a threat to my child, can be found in the court transcripts. Forcing me to repeat goal I've already met that I should not have even had to obtain, all based on lies told, & misinterpreted information misconstrued intentionally by "professionals & people in position of authority whom did not perform their job or did not perform their job adequately is unfair. The System totally ignored the facts... all of them. And failed to provide me with pertinent requested documents/information. Therefore, violating my Federal Parental Rights protected under the 2<sup>nd</sup>, 4<sup>th</sup>, 5<sup>th</sup> & 14<sup>th</sup> Amendments, as well as numerous State Law violations. All of which has led to the deterioration of me & my child's relationship and life during my child's developmental years.



Marge Wams  
TMW

They have corrupted my child's mental, emotional, spiritual & physical well being causing me Mental Anguish and a great deal of suffering. Theft of a child through fraud by deception all of which was done with Malice Intent as a form of Retaliation.

Margo Deems  
TMW



All Defendants cont. (But not limited to)  
Philadelphia County Family Court  
1501 Arch St, Phila PA 19102

Judges : Vincent W. Furlong  
Margaret T. Murphy / Duane Grey  
Walter J. Olszewski Honorable Judge Martinez

InterCommunity Action / Greenridge Counseling  
6122 Ridge Ave Phila, PA 19128

Lena Hayes  
Joane Minerva PsyD  
Amanda Kumar

Philadelphia Law Dept/  
1515 Arch St Fl 15/16

Phila PA 19105 - ACS McLaughlin  
Caroline B. Curley  
Kathleen K. Bola  
Jonathan Haulon

Child Advocate Curley Antell 2926 Cambridge St.  
Phila PA 19130

Child Attorney Lue B Frierson 2333 St Albanas<sup>FL</sup>  
Phila PA 19146

Forensis Mental Health Services, LLC/ATA  
1241 Vine St. Phila, PA 19107  
William Russell, PhD Erica G. Williams  
Morgan Berhart M.A.

Behavioral Health Forensic Eval. Center  
1501 Arch St. Phila PA 19102 8th fl.  
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All Defendants Cont. (But not limited to)

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